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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 15-00264 LHK/HRL
Plaintiff,	)	
v.	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	EXCLUDING TIME UNDER THE SPEEDY TRIAL
	)	ACT
JOSEPH SHAYOTA,	)	
ADRIANA SHAYOTA,	)	SAN JOSE VENUE
JUSTIN SHAYOTA,	)	
WALID JAMIL, a/k/a Wally Jamil,	)	
RAID JAMIL, a/k/a Brian Jamil,	)	
KEVIN ATTIQ	)	
FADI ATTIQ, a/k/a Fred Attiq,	)	
LESLIE ROMAN,	)	
MARIO RAMIREZ, and	)	
CAMILO RAMIREZ,	)	
Defendants.	)	

On July 9, 2015, the undersigned parties appeared before the Court for an initial appearance in the above-captioned matter. Each defendant, through his or her counsel, entered a not guilty plea and agreed to an exclusion of time under the Speedy Trial Act from July 9, 2015 through August 5, 2015. The parties agree and stipulate that an exclusion of time is appropriate based on the defendant's need for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). Specifically, the government is

1 preparing a voluminous amount of discovery and anticipates on making it available to the defendants  
2 through a third party vendor before the next court appearance on August 5, 2015.

3 SO STIPULATED:

4 DATED: July 13, 2015

MELINDA HAAG  
United States Attorney

5  
6 /s/

MATTHEW A. PARRELLA  
SUSAN KNIGHT  
Assistant United States Attorneys

8 DATED: July 13, 2015

9  
10 /s/

GREGORY A. VEGA  
Counsel for Joseph Shayota

11 DATED: July 13, 2015

12  
13 /s/

JOSEPH M. MCMULLEN  
Counsel for Adriana Shayota

14  
15 DATED: July 13, 2015

16  
17 /s/

GINNY H. K. WALIA  
Counsel for Justin Shayota

18 DATED: July 13, 2015

19  
20 /s/

JAMES T. REILLY  
Counsel for Walid Jamil

21  
22 DATED: July 13, 2015

23  
24 /s/

DAVID R. KNUTSEN  
Counsel for Raid Jamil

25 DATED: July 13, 2015

26  
27 /s/

THOMAS J. WARWICK, JR.  
Counsel for Kevin Attiq

1 DATED: July 13, 2015

2 /s/  
3 THOMAS J. WARWICK, JR.  
Counsel for Fadi Attia

4 DATED: July 13, 2015

5 /s/  
6 ROBERT CARLIN  
7 Assistant Federal Public Defender  
Counsel for Leslie Roman

8 DATED: July 13, 2015

9 /s/  
10 KNUT JOHNSON  
11 Counsel for Mario Ramirez

12 DATED: July 13, 2015

13 /s/  
14 JUDY CLARKE  
15 Counsel for Camilo Ramirez

16 **ORDER**

17 Accordingly, for good cause shown, the Court HEREBY ORDERS that time be excluded  
18 under the Speedy Trial Act from July 9, 2015 through August 5, 2015. The Court finds, based on the  
19 aforementioned reasons, that the ends of justice served by granting the requested continuance outweigh  
20 the best interest of the public and the defendant in a speedy trial. The failure to grant the requested  
21 continuance would deny defense counsel reasonable time necessary for effective preparation, taking into  
22 account the exercise of due diligence, and would result in a miscarriage of justice. The Court therefore  
23 concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

24 SO ORDERED.

25 DATED:

26 7/14/15

27 HON. HOWARD R. LLOYD  
United States Magistrate Judge